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**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION**

In re:  
JOSE DAVID SANCHEZ

Address: 20370 VALLEY BLVD.  
TEHACHAPI, CA 93561

Social Security No(s)/TID No(s).  
xxx-xx-3226

Debtor.

Case No.: 13-14296-A-13K  
Chapter 13  
Docket Control No.: PWG-1

**DATE: September 25, 2013**  
**TIME: 9:00 a.m.**  
**PLACE: 1300 18<sup>th</sup> Street, Suite A**  
**Bakersfield, CA 93301**  
**JUDGE: Hon. Fredrick E. Clement**

**DEBTOR'S MOTION TO VALUE COLLATERAL OF FORD MOTOR CREDIT**  
**COMPANY, LLC AND BIFURCATE THE CREDITOR'S CLAIM UNDER 11 U.S.C §§**  
**506(a), (d) and 1325(a)(5)(B)**

TO FORD MOTOR CREDIT COMPANY, LLC, ITS SUCCESSORS, ASSIGNS AND  
ATTORNEY(S) OF RECORD:

You are hereby notified that the debtor, under 11 U.S.C. sections 506(a) and (d),  
1325(a)(5)(B), and Fed. R. Bankr. P. 3012, Local Bankruptcy Rule 3015-1(j), will and does, move  
this court for an order: (1) finding that the value of the collateral is the amount stated in the  
declaration of the debtor in support of this motion; (2) determine the creditor's claim in excess of the  
value is wholly unsecured; (3) deem this creditor's secured and unsecured claims as provided for  
under the chapter 13 plan; (4) finding that service was proper on the named creditor; (5) finding that  
upon completion of the payments under the plan this lien is fully satisfied; and (6) determine that  
this treatment under the chapter 13 plan shall be binding on any successors and assigns. A copy of  
the chapter 13 plan is included in the exhibits supporting this motion and incorporated by reference  
into this motion.

<sup>1</sup> The term "debtor" includes both the singular and plural. See 11 U.S.C. § 107(2).

DATED: September 10, 2013

Respectfully submitted,

By: 

Phillip W. Gillet, Jr.  
Attorney for debtor

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